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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-3664-YGR-SVK  
[PROPOSED] ORDER GRANTING  
MOTION TO SEAL  
Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' Administrative Motion to File Under Seal Portions of Plaintiffs' Motion to Depose Google CEO Sundar Pichai, Dkt. 634 ("Motion"). Having considered the Motion, supporting declarations, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Portion of Document Sought to be Sealed	Basis for Sealing Portion of Document
Plaintiffs' Renewed Request to Depose Google CEO Sundar Pichai	GRANTED as to the portions at:  Pages: 2:22-27, 3:1, 3:3, 3:7-9	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit A to Baeza Declaration (GOOG-CABR-05468324)	GRANTED as to the portions at:  Seal Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities, that Google maintains as

		<p>confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
<p>Exhibit E to Baeza Declaration (Deposition of Chris Palmer)</p>	<p>GRANTED as to the portions at:</p> <p>Pages: 113:13-14, 187:17, 188:2, 188:7, 188:17, 188:23, 189:2, 189:6, 189:9, 189:14, 189:18-21</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>

<p>1 Exhibit G to Baeza 2 Declaration (GOOG- 3 BRWN-00391231)</p>	<p>GRANTED as to the portions at:</p> <p>Pages: -231, -232</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
<p>17 Exhibit H to Baeza 18 Declaration (GOOG- 19 CABR-04971903)</p>	<p>GRANTED as to the portions at:</p> <p>Page: -903</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and</p>

		practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit L to Baeza Declaration (GOOG-CABR-04991831)	GRANTED as to the portions at:  Page: -831	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit M to Baeza Declaration (GOOG-BRWN-00140297)	GRANTED as to the portions at:  Pages: -311-313, -315-319, -323, -325, -327-329	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its

1			important services, and falls within the
2			protected scope of the Protective Order
3			entered in this action. See Dkt. 81 at 2-3.
4			Public disclosure of such confidential and
5			proprietary information could affect
6			Google's competitive standing as
7			competitors may alter their systems and
8			practices relating to competing products.
9	Exhibit N to Baeza	GRANTED as to the	The information requested to be sealed
10	Declaration (GOOG-	portions at:	contains Google's highly confidential and
11	CABR-05126022)	Page -023	proprietary information regarding highly
12			sensitive features of Google's internal
13			systems and operations, including
14			Google's internal projects and identifiers,
15			that Google maintains as confidential in
16			the ordinary course of its business and is
17			not generally known to the public or
18			Google's competitors. Such confidential
19			and proprietary information reveals
20			Google's internal strategies, system
21			designs, and business practices for
22			operating and maintaining many of its
23			important services, and falls within the
24	Exhibit O to Baeza	GRANTED as to the	protected scope of the Protective Order
25	Declaration	portions at:	entered in this action. See Dkt. 81 at 2-3.
26	(GOOG-CABR-04675770)	Pages: -770-771	Public disclosure of such confidential and
27			proprietary information could affect
28			Google's competitive standing as
			competitors may alter their systems and
			practices relating to competing products.
			It may also place Google at an increased
			risk of cybersecurity threats, as third
			parties may seek to use the information to
			compromise Google's internal practices
			relating to competing products.
			The information requested to be sealed
			contains Google's highly confidential and
			proprietary information regarding highly
			sensitive features of Google's internal
			systems and operations, including
			Google's internal projects and identifiers,
			that Google maintains as confidential in
			the ordinary course of its business and is

1			not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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12	Exhibit P to Baeza Declaration (Deposition of Rory McClelland)	GRANTED as to the portions at:  Pages: 118:2, 118:7, 118:12, 118:15-16, 118:23, 120:4-5, 120:11	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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28	Exhibit Q to Baeza Declaration	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and



<p>(Deposition of Abdelkarim Mardini)</p>	<p>Pages: 317:7, 317:14-15, 317:22-23, 318:1-2, 318:4, 318:15-319:8, 319:14, 371:7-10, 371:13-15, 371:22-23, 372:1-2, 373:14,18, 373:22-24</p>	<p>proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
<p>Exhibit R to Baeza Declaration (Deposition of Chetna Bindra)</p>	<p>GRANTED as to the portions at:</p> <p>Pages: 218:11-13</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products.</p>



		It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit S to Baeza Declaration (GOOG-BRWN-00388293)	GRANTED as to the portions at:  Page: -295	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal communication channels, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit T to Baeza Declaration (Deposition of Lorraine Twohill)	GRANTED as to the portions at:  Page: 120:6-12	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected

1			scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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8	Exhibit V to Baeza Declaration (GOOG-CABR-00501220)	GRANTED as to the portions at:  Pages: -221-222, - 224-225	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
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24	Exhibit Y to Baeza Declaration (GOOG-CABR-05756489)	GRANTED as to the portions at:  Pages: -491, -494, - 499-501, -504-505, - 507-512	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities, that Google maintains as
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		<p>confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
<p>Exhibit Z to Baeza Declaration (GOOG-BRWN-00406065)</p>	<p>GRANTED as to the portions at:</p> <p>Pages: -065-069</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>

<p>Proposed Order</p>	<p>GRANTED as to the portions at:</p> <p>Page: 6:2, 6:4-5, 6:7-8, 6:11, 6:16, 6:18, 6:28</p>	<p>The information requested to be sealed contains Google’s highly confidential and proprietary information regarding highly sensitive features of Google’s internal systems and operations, including Google’s internal projects and identifiers, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google’s competitors. Such confidential and proprietary information reveals Google’s internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google’s competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google’s internal practices relating to competing products.</p>
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**SO ORDERED.**

DATED: \_\_\_\_\_

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HON. SUSAN VAN KEULEN  
United States Magistrate Judge